

Message

From: Stauffer, Panah [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=50083CE00E384879B4E4E066B0923C22-BHALLA, PANAH]
Sent: 8/9/2019 11:50:51 PM
To: Doug Carson [DCarson@co.calaveras.ca.us]
CC: Xu, Jin@ARB [jin.xu@arb.ca.gov]; Smith, Noah [SMITH.NOAH@EPA.GOV]
Subject: RE: Calaveras O3 plan
Attachments: 2015-04PCAPCDOzoneEmergencyEpisodePlanFinalDraft(public).pdf

Hi Doug,

Thanks so much for your message. I also just left you a voicemail. I forgot to say that it's fine if you need more time to work on our comments. We understand that September may not be attainable at this point, and you won't be the only district in that situation.

We're working with many districts right now to improve upon the Placer template. The goal is to make the plans more defensible and to be more consistent with our regulations, especially [40 CFR Part 51, Appendix L](#).

I'm in the office next week and am happy to talk with you about our comments, and Jin and Noah will be back the following week if there are questions I can't answer. In the meantime, I've attached the final Placer plan. It has language about inspection of sources, which is one of the requirements in [40 CFR 51.152\(b\)\(2\)](#) for emergency episode plans.

Thanks for sending the document from the designations TSD. The comments we made this week were about the new monitoring data- I think there are only two notes. Hopefully those are easy changes.

I really appreciate your working with us on this and thank you for your time!

Hope you have/had a great weekend in the Sierras,
Panah

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From: Doug Carson <DCarson@co.calaveras.ca.us>
Sent: Thursday, August 08, 2019 10:40 AM
To: Stauffer, Panah <Stauffer.Panah@epa.gov>
Subject: Calaveras O3 plan

Hi Panah!

We did some work together last spring with our NSR rule 428 and I thought it would be a little easier if I could just interact directly with you. I've been working on the O3 plan for several months in that I understood there is a September deadline. I first heard of this plan requirement in February, had obtained the Placer plan and used it as a template after also obtaining the Calaveras data from the same place they got their data, and sent in my first draft for preapproved 5/17. Jennette had looked at 2 drafts and gave me a preliminary OK at which point I routed the plan through our OES office to get their agreement. They did. Just before I put it out for notice, Jennette asked to see the final draft. That's what you are looking at now. I also recently found out that 'public notice' in this case is newspaper

published and not just posting on our website as I was originally told. Given we need a 30 day notice, time for responses, time to agendize the plan, board approval and then state approval, we are now not going to make the September deadline.

I'm a bit confused by all the needed changes because I am using as a template the Placer plan. I'm under the impression it was already approved in 2015. We up here in the Mountain Counties Air Basin often respond to emergencies in the same way because our resources are so similar and so using their already approved language is likely the best way to go for me. I've included the Placer plan that I've been using as well as the EPA document where I took a lot of the data and language from. Could you send me Placer final approved plan so I can use that language?

I'll be out of the office until Monday (I'm going up to the Sierras) so I can't respond until then. In any case, thank you for your help!

Regards,
Doug

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*To serve and protect
public health, public safety,
and our environment*

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